



Concept Environmental and Social Review Summary

Concept Stage

(ESRS Concept Stage)

Date Prepared/Updated: 06/18/2019 | Report No: ESRSC00630



BASIC INFORMATION

A. Basic Project Data

| | | | |
|--------------------------------|--|--------------------------|----------------------------|
| Country | Region | Project ID | Parent Project ID (if any) |
| El Salvador | LATIN AMERICA AND CARIBBEAN | P169677 | |
| Project Name | Promoting Human Capital in Health in El Salvador | | |
| Practice Area (Lead) | Financing Instrument | Estimated Appraisal Date | Estimated Board Date |
| Health, Nutrition & Population | Investment Project Financing | 10/16/2019 | 12/12/2019 |
| Borrower(s) | Implementing Agency(ies) | | |
| Republic of El Salvador | | | |

Proposed Development Objective(s)

The overarching objective of the Project is to promote human capital accumulation. Specifically the PDOs are: (a) to foster healthy environments for children, adolescents and adults; and (b) to improve health service delivery for selected NCDs.

| Financing (in USD Million) | Amount |
|----------------------------|---------------|
| Total Project Cost | 200.00 |

B. Is the project being prepared in a Situation of Urgent Need of Assistance or Capacity Constraints, as per Bank IPF Policy, para. 12?

No

C. Summary Description of Proposed Project [including overview of Country, Sectoral & Institutional Contexts and Relationship to CPF]

The Project focuses on the essential elements that protect the human capital, including: full implementation of polices to protect the first 1000 days of children; strengthening of early detection and follow up of population with risk factors and NCDs; strengthening of cross thematic areas (nutrition, gender and prevention or contention of violence); implementation of efficiency measures for service delivery; introduction of measurement for results of by municipality with close monitoring of certification processes and quality of care. This project proposes an investment with short, medium- and long-term results although engrained in the institutional mechanisms in place that will make

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the innovations sustainable. It includes leveraging resources, as well as achieving greater spending efficiency in health, and creating strong links with other sectors that are also important contributors to human capital acceleration. It will also develop governance, gender, violence and service delivery strategies to counteract some of the worst barriers to human capital development facing El Salvador today.

D. Environmental and Social Overview

D.1. Project location(s) and salient characteristics relevant to the ES assessment [geographic, environmental, social]
The project will be implemented nationally and locally in both urban and rural areas. The project aims to promote human capital (health, skills, knowledge and experience) through the improvement of healthy environments and the strengthening of health care provisions. The exact locations of project activities have not been identified at this stage, but it is expected that these will take place in existing Early Childhood Development (ECD) centers, schools and medical facilities across selected municipalities, which will be chosen based on their readiness to develop, expand, and strengthen the programs. Some project activities will include small civil works involving the rehabilitation and expansion of already built infrastructure mostly to take place in schools. The full description of these activities and exact locations will be defined during project preparation, but at this stage no significant negative environmental and social impacts are expected. There are around 14,300 indigenous peoples in El Salvador, representing about 0.7% of the population. As the project is national in scope, Indigenous Peoples will be beneficiaries. In addition, some of the selected municipalities will likely be in areas where indigenous peoples meeting the criteria of ESS7 are present or have collective attachment to the project area.

The project is not expected to escalate personal, communal or interstate conflict, crime or violence. However, El Salvador's high levels of contextual violence constitute a threat to the promotion of healthy environments. El Salvador has one of the highest violence rates in LAC in three domains: domestic violence, sexual violence against women, and street/gang related violence. The continued violence threatens the growth and human development of the population. El Salvador ranks in the top 5 countries worldwide for homicide rates. In the Central American region, the country has the highest homicide rate, with 81.2 homicides per 100,000 people in 2016. Young males are more likely to be victims of homicide, and women are more likely to experience violence by someone they know. Gender-based violence is highly prevalent in El Salvador. In 2017, at least 10880 acts of violence against women were committed, which is equivalent to a rate of 599.4 per 100,000 women. The Social Assessment (SA) conducted in the context of the Addressing Non-Communicable Diseases grant (P164356) (more details under section D.2 below) suggests that different types of gender-based violence (psychological, emotional, physical, and/or sexual) may negatively influence women's health decisions. In addition, some members of society are particularly vulnerable to gender-based violence, including sex workers, trans men, and rural women. This SA also found specific barriers to access to health benefits in trans men. In addition, persons with disabilities may also experience specific barriers to participation in project benefits.

D. 2. Borrower's Institutional Capacity

The proposed project will be implemented by the Ministry of Health (MINSAL, for its acronym in Spanish) through a Project Management Unit within MINSAL (UGP, for its acronym in Spanish). The UGP will be responsible for the implementation, management, monitoring and reporting of project activities as well as for the environmental and social compliance measures. The MINSAL has prior experience implementing Bank financed projects in compliance with the Bank's IPF environmental and social safeguards policies. This experience draws upon a number of already



completed health related projects, such as the Earthquake Emergency Recovery and Health Services Extension Project (P067986) and the Strengthening the Public Health Care Project (P117157). In addition, the MINSAL has prior experience in designing and implementing Occupational Health and Safety plans and has established an Occupational Health and Safety Committee within their organizational structure focused on ensuring proper health and safety activities within their services and facilities.

The ongoing Addressing Non-Communicable Diseases Grant (P164356), implemented by MINSAL, is piloting an integrated health care service delivery model to improve the prevention, early detection, and treatment of cervical cancer as well as the prevention of NCD risk factors in selected regions of the country. Component 1.4 of the current project would support the expansion of the line of care from three networks supported under the ongoing grant to all health networks in the country. Under the grant, MINSAL prepared a Social Assessment exploring the possible impacts of the health service delivery model in target populations, including indigenous peoples and vulnerable groups. The SA also evaluated MINSAL’s existing national-level Grievance Redress Mechanism (GRM) and provided recommendations for its strengthening.

While MINSAL has prior experience working with World Bank safeguard policies, this is the first project it will implement under the new Environmental and Social Framework (ESF). The Borrower’s capacity to manage environmental and social risks will be further assessed during project preparation to determine any capacity gaps and specific training needs in relation to the ESF. The Bank will provide guidance and support to MINSAL and the UGP for the development of the project’s environmental and social management instruments. Specific capacity building measures agreed between the Bank and the Borrower, such as additional training, will be included in the ESCP.

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II. SCREENING OF POTENTIAL ENVIRONMENTAL AND SOCIAL (ES) RISKS AND IMPACTS

A. Environmental and Social Risk Classification (ESRC)

Moderate

Environmental Risk Rating

Moderate

The environmental risk rating for the project is considered moderate at this stage. The project will mainly invest in training and capacity building activities to strengthen human capital in El Salvador. Some civil works are expected, mostly small scale, for the rehabilitation and expansion of already existing infrastructure. At this stage, the description of activities and the specific locations where the construction activities will take place are unknown. Based on the available project description, some of these activities may include roofing repairs, window and door replacements, sanitary facilities, and possible small infrastructure expansion. Key environmental risks and impacts are expected to be site-specific, short-term and reversible. Some of the anticipated potential impacts may include: (i) impacts on surface and groundwater quality (ii) generation of solid waste from residual construction materials; (iii) nuisance related to dust generation, vibration and noise; and (iv) occupational health and safety hazards for the workforce. The scale of these impacts will depend on the extent of expansion and rehabilitation activities on existing infrastructure, which will be defined during preparation.

Social Risk Rating

Moderate



The project’s social risk is considered moderate. The project is expected to have mostly positive social effects from the promotion of healthy environments throughout the different stages of a person’s life, as well as the strengthening of the quality of healthcare provision. Social risks include exacerbating existing inequalities if indigenous peoples, afro-Salvadorians, persons with disabilities, LGBTI people, women and girls, those living under poverty, and other vulnerable groups are excluded from project benefits because specific barriers to access are not properly identified. In addition, contextual crime and violence in the country, including high prevalence of GBV, can make access to project benefits more difficult, especially for children, youth, women, and LGBTI people. Other risks include community health and safety impacts from management of medical equipment and construction impacts from civil works.

B. Environment and Social Standards (ESSs) that Apply to the Activities Being Considered

B.1. General Assessment

ESS1 Assessment and Management of Environmental and Social Risks and Impacts

Overview of the relevance of the Standard for the Project:

Based on available information at concept stage, the project is expected to have moderate environmental risks and impacts as most activities are related to training and capacity building to strengthen human capital in El Salvador. Some civil works are expected, mostly small scale, for the rehabilitation and expansion of already existing infrastructure specifically under Component 1 “Promoting a healthy environment and preventing the early onset of diseases”. This component will involve small construction activities for rehabilitation and expansion activities on already built infrastructure across selected municipalities located in urban and rural areas of the country. Potential environmental and social impacts expected to occur during the construction phases of the project are anticipated to be site-specific, manageable and temporary. Neither the exact locations of the infrastructure work nor the type of civil works have yet been identified in detail at this stage. For Component 2 “Strengthening the quality of health care provision” no negative environmental risks and impacts have been identified at this stage as this will component will only finance training and capacity building activities focused on strengthening the hospital network nationwide to improve the efficiency and quality of their services.

The project is mainly expected to have positive social impacts through the promotion of healthy environments throughout the different stages of a person’s life, as well as the strengthening of the quality of healthcare provision. Social risks include exacerbating existing inequalities if potential impacts to and barriers to access for indigenous peoples, afro-descendants, persons with disabilities, LGBTI people, women and girls, people living in poverty and other vulnerable and disadvantaged groups are not properly identified and addressed.

Based on the scope of the project’s activities, which include technical assistance, capacity building, and infrastructure interventions for which exact locations and extent of the work are not yet known, the Borrower will be asked to prepare, consult with main stakeholders, and disclose an Environmental and Social Management Framework (ESMF) in line with the Bank’s Environmental and Social Standards and the World Bank Group Environment, Health and Safety (EHS) Guidelines prior to appraisal. The ESMF will also be disclosed on the Bank’s website prior to appraisal. The ESMF will include the following:

- (i) A project-level Environmental and Social Assessment (ESA) that will cover all project financed activities to identify potential environmental and social risks and impacts. The ESA will build on the relevant contents of the Social Assessment that was prepared for the Addressing Non-Communicable Diseases Grant (P164356), which covers the



health service delivery model that will be expanded nationally under component 1.4 of this project. The project’s ESA will analyze the positive and negative, direct and indirect impacts, as well as barriers to access and opportunities for greater inclusion of vulnerable groups of the range of life-cycle interventions under component 1, as well as the changes to the financing, scope, and capacity of primary health facilities through updates to clinical guidelines and pathways, integration of first and second level services, among other activities in component 2. The new project’s ESA will explore how crime and violence, gender factors, LGBTI status and disability may present differentiated barriers to access to project benefits, and how these can be addressed through project design. Measures to address potential social conflict and reduce project risks will also be assessed in the ESA and will be described in the appraisal stage ESRS. Adjustments to project design and the institutional and implementation arrangements made based on the findings of the ESA will apply the mitigation hierarchy (anticipation and avoidance, minimization, mitigation, offset or compensation).

(ii) Screening checklists and procedures to classify specific project activities according to their environmental and social risks and impacts. This will help to determine the type of environmental and social management instrument to be developed based on the scope and scale of the activities to be financed that will be known during appraisal.

(iii) A generic Environmental and Social Management Plan (ESMP) with general mitigation measures for the project activities (once further defined), including considerations for the construction and operational phases of any infrastructure works, capacity requirements, roles and responsibilities, and implementation costs. The ESMF will include procedures to determine the type of project activities that may require a specific ESMP based on the scope and scale of the identified impacts.

In addition to the ESMF, the client will prepare and disclose an Environmental and Social Commitment Plan (ESCP) before appraisal which will be reviewed by the Bank. The necessary measures that the project will need to address during preparation and implementation will be included in this plan. The ESCP will also cover all measures and actions to ensure compliance with the ESF and the social and the project’s social and environmental instruments. Full implementation details, including monitoring and reporting activities will be included in the ESCP.

Areas where “Use of Borrower Framework” is being considered:

None.

ESS10 Stakeholder Engagement and Information Disclosure

The Borrower will be asked to prepare a Stakeholder Engagement Plan (SEP) describing the timing and methods of engagement with stakeholders throughout the life-cycle of the project, including at least one round of meaningful consultations with key stakeholders during project preparation, and the consultations and stakeholder engagement activities necessary, during project implementation including any necessary local-level consultations once the locations are known, as agreed between the Bank and the Borrower. The SEP will distinguish between project-affected parties and other interested parties. The SEP will also describe the range and timing of information to be communicated to project-affected parties and other interested parties, as well as the type of information to be sought from them and describe the measures that will be used to remove obstacles to participation and how the views of differently affected groups will be captured. The SEP will also include, if necessary, differentiated measures to allow the effective participation of those identified as disadvantaged or vulnerable. The SEP will be disclosed as soon as possible and prior to appraisal.



The Borrower has experience carrying out consultations under World Bank projects and understands the need of robust stakeholder engagement and wide-ranging consultation at the national level for the project. While contextual factors including crime and violence are not expected to affect national-level consultations during preparation, the ESA will analyze how such factors may affect stakeholder engagement at the local level. If such risks are identified for specific locations, measures including the help of third-party facilitators will be considered to facilitate stakeholder engagement, and the project's ESRC may be revised accordingly.

The ESA will contribute to the identification of stakeholders. The ESA will build on the work of the Social Assessment for the NCD project, which already identified the following as potential project affected parties: adults with NCD disease risk or diagnosis, sex workers, LGBTI people including trans men, indigenous people and their representative organizations at the national level, children and adolescents and their parents, female-headed households, health workers, municipal health committees, municipal authorities. Other potential interested parties identified by this SA include national level non-governmental organizations including women's and LGBTI groups. The SEP will describe the consultations carried out in the Social Assessment process of the NCD project on issues relevant to the activities under this project.

The project will use MINSAL's existing Grievance Redress Mechanism (GRM) at the national level, which will be strengthened during project preparation. Through a recent review of its GRM, MINSAL identified barriers to use among different stakeholders, including disadvantaged and vulnerable groups. The main issues identified include lack of awareness of the GRM and the grievance redress process, as well as lack of trust in the system. In addition, work is needed to integrate the different existing parts of the system into a coherent whole, as well as formalize a GRM policy and procedures based on the requirements of ESS10. Special attention should be given to procedures to ensure confidentiality, especially in relation to allegations of sexual exploitation and abuse and gender-based violence, and to ensure that the GRM is socio-culturally appropriate in areas where Indigenous Peoples are present, based on the requirement of ESS7. The GRM will be included as part of the Stakeholder Engagement Plan.

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B.2. Specific Risks and Impacts

A brief description of the potential environmental and social risks and impacts relevant to the Project.

ESS2 Labor and Working Conditions

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MINSAL staff and healthcare professionals working in the project are likely to be civil servants with existing public sector employment agreements or arrangements. Worker categories under ESS2 that may be relevant in the project include direct, contracted, and community workers. The borrower may employ workers directly for activities in component 1, while civil works in health centers and schools may involve contracted workers. In addition, if community-based activities are implemented, these may involve community labor. The project will not hire children and will consider the national legal framework and international regulations regarding child labor. The borrower will prepare Labor Management Procedures (LMP) before appraisal to identify the different types of project workers that are likely to be involved in the project and set out the way in which the different types of project workers will be managed, in accordance with the requirements of national law and ESS2, including the requirements of ESS2 that



apply to government civil servants (paragraphs 17-20 and 24-30). The LMP will also contain measures to address any potential risks and impacts that may arise from the interaction between project workers and local communities.

Occupational Health and Safety (OHS) considerations will be included to ensure health and safety of workers during the construction phase of the project, the borrower will develop and implement a Health and Safety Plan (HSP) in line with the World Bank Group EHS Guidelines. Some OHS hazards may include among others: (i) falls from heights; (ii) electric shocks; and (iii) failure to use proper protective equipment. The legal framework of El Salvador has a specific law for the Prevention of Risks in Workplaces that provides a good foundation for the HSP that will be developed. This plan will include procedures for safety measures in relation to physical and chemical hazards in the workplace, emergency preparedness and response procedures, trainings and incident monitoring and reporting. Occupational health and safety issues related to the Labor Management Procedures will be considered in the generic ESMP, TORs and bidding documents as needed.

The project will promote transparency in terms and conditions of employment, nondiscrimination and equal opportunity. In addition, Labor Management Procedures will include a GRM specifically for project workers to ensure they have a mechanism in place for complaints and grievances.

ESS3 Resource Efficiency and Pollution Prevention and Management

The standard is relevant given that the possible construction activities known at this stage may generate pollution in different forms. Appropriate mitigation measures will be developed as part of the ESMF following the mitigation hierarchy. Some possible mitigation measures will include the following:

- (i) Construction material: All construction materials needed for the civil works (sand, stones, timber, etc.) will be obtained from licensed quarries and certified timber suppliers.
- (ii) Waste management: Construction waste may include mostly waste from debris and hazardous waste such as hydrocarbon oils from construction machinery and vehicles. Any waste generated by the construction activities will be disposed according to national regulations and international best practices. The generic ESMP will include specific measures for the management of dangerous materials during the demolition of existing infrastructure that could potentially contain asbestos or other dangerous materials. If it is determined during project preparation that electronic equipment will be replaced, the generic ESMP will include electronic waste (e-waste) management considerations.
- (iii) Air emissions and noise: These may be generated during the construction phase from the use of heavy vehicles, machinery, and construction activities. Mitigation measures to be implemented as needed may include dust suppression and vehicle maintenance to minimize the impact of air emissions. Noise may likely be generated from the use of construction machinery and vehicle movement depending on the scale and scope of project activities. The relatively short-term and small-scale nature of the works suggests that noise levels will not be excessive or cause long-term nuisances. However, mitigation measures will be considered to minimize and manage the noise levels by applying work hours restrictions.
- (iv) Water: Some of the project activities may include the installation of bathrooms connections to the water and sanitation system. Specific mitigation measures will be considered to ensure a proper installation of these..



(v) Energy efficiency measures such as efficient lighting, cooling, heating and other energy efficiency equipment, as well as, water efficiency equipment will be considered during the construction phase.

ESS4 Community Health and Safety

The project is expected to have positive impacts on community health through improved delivery of health services and promotion of healthy environments.

The project may involve some works related to the rehabilitation and expansion of already existing infrastructure. All structural elements of the project will be designed, constructed, and operated per the requirements of ESS4, national legal requirements, the relevant EHSG, and other GIIP, taking into consideration safety risks to third parties and affected communities, as well as the concept of universal access when feasible. In particular, as the project involves provision of services to communities, the Borrower will establish and implement appropriate quality management systems to anticipate and minimize risks and impacts that such services may have on community health and safety. Such systems will be included in the ESMF and any subsequent site-specific ESMPs.

Project activities may carry the potential for community exposure to hazardous materials and substances. The risks and impacts on community health from hazardous materials that may be used during project activities will be part of the ESMF and measures to reduce or mitigate the risks will be included in the generic ESMP and any subsequent site-specific ESMPs.

Given the small scale of proposed civil works, labor is likely to be available locally. However, the screening checklist in the ESMF will identify the need for outside labor, and if this is the case, site specific ESMPs will contain specific measures to mitigate the risks of labor influx.

The use of security workers is not expected based on the information available at this stage of project preparation. The screening checklist in the ESMF will assess the security risks of site-specific activities and the potential need for security workers to protect personnel or property. If such is the case, the specific ESMP will outline how the provisions of paras 24-27 of ESS4 will be followed. The project's ESRC may be revised if the need to retain security workers is identified.

ESS5 Land Acquisition, Restrictions on Land Use and Involuntary Resettlement

The project's civil works include minor construction, expansion, or rehabilitation of buildings, which will not involve land acquisition or restrictions on land use. Any proposed subproject that involves impacts covered under ESS5 will be screened out using the screening checklist in the ESMF.

ESS6 Biodiversity Conservation and Sustainable Management of Living Natural Resources

At this stage, the project is not expected to have negative impacts on any critical or sensitive natural habitats, biodiversity areas and living natural resources as all civil works are expected to take place on existing infrastructure.



However, the ESMF will provide guidance on screening and applying mitigation measures to ensure that project activities do not alter or cause destruction of any critical or sensitive natural habitats.

ESS7 Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities

There are around 14,300 indigenous peoples in El Salvador, representing about 0.7% of the population. As the project is national in scope, Indigenous Peoples will be beneficiaries. In addition, some of the selected municipalities may be located in areas where indigenous peoples fitting the definition of ESS7 may be present or have collective attachment to the project area.

The previous project's SA identified the importance of the inclusion of beliefs and practices based on the indigenous worldview in promoting the participation of indigenous peoples in the health system and services. Furthermore, the Plan de Acción Nacional de Pueblos Indígenas (PLANPIES) of El Salvador identifies the promotion of intercultural health and strengthening of the intercultural health system as a priority issue. The project is an important opportunity to assess the potential barriers to access of indigenous peoples to project benefits and implement measures to improve health provision in a manner consistent with the PLANPIES.

The Borrower will be asked to prepare, consult, and disclose an Indigenous Peoples Planning Framework for the national level interventions before appraisal, as well as Indigenous Peoples' Plans during project implementation focused on communities with similar cultural characteristics in municipalities where Indigenous Peoples might be present. These requirements will be included in the ESCP. The IPPF will draw on the results of the ESA and will focus on identifying barriers to access and ensuring project benefits are culturally pertinent, including in relation to the intercultural health system in indigenous territories, the awareness of health staff working in indigenous territories about indigenous, rights, traditional and intercultural health, and the participation of traditional authorities and the communities, as well as measures to eliminate discriminatory practices against Indigenous Peoples within health services.

ESS8 Cultural Heritage

At this stage the project is not expected to have negative impacts on cultural heritage, whether it is tangible or intangible as all civil works are expected to take place on existing infrastructure. The IPPF required under ESS7 will analyze the relevance for the project of traditional medicinal knowledge of indigenous people.

ESS9 Financial Intermediaries

The standard is not relevant. FI's are not part of this project.

B.3 Other Relevant Project Risks

All environmental and social risks associated to the project investments identified at this stage have been described in the sections above. The environmental and social assessment to be prepared will evaluate any other potential risk that may be connected to the activities that will be financed under the IPF as they are further defined during preparation.



C. Legal Operational Policies that Apply

OP 7.50 Projects on International Waterways

No

This policy is not triggered as the project will not work in International Waterways.

OP 7.60 Projects in Disputed Areas

No

This policy is not triggered as the project will not work in disputed areas.

III. WORLD BANK ENVIRONMENTAL AND SOCIAL DUE DILIGENCE

A. Is a common approach being considered?

No

Financing Partners

There are no financing partners.

B. Proposed Measures, Actions and Timing (Borrower’s commitments)

Actions to be completed prior to Bank Board Approval:

Prior to appraisal the borrower will prepare draft versions of the following documents that provide the necessary level of detail to inform stakeholder engagement and Bank decision-making and are key for understanding the project’s most relevant environmental and social risks and impacts:

- Environmental and Social Management Framework (ESMF) including:
 - o ESA
 - o Subproject Screening checklist
 - o Generic ESMP
- Indigenous Peoples Planning Framework (IPPF)
- Labor Management Procedures (LMP)
- Stakeholder Engagement Plan (SEP)
- Environmental and Social Commitment Plan (ESCP)

Possible issues to be addressed in the Borrower Environmental and Social Commitment Plan (ESCP):

- The preparation and implementation of the ESMF, ESMPs as appropriate, IPPF, IPPs as appropriate.
- The completion of and implementation of the SEP.
- The completion of and implementation of the LMP.
- Any necessary environmental and social capacity building measures.

C. Timing

Tentative target date for preparing the Appraisal Stage ESRS

27-Sep-2019

IV. CONTACT POINTS

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World Bank

| | | | |
|---------------|-----------------------------|--------|------------------------------|
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Borrower/Client/Recipient

Borrower: Republic of El Salvador

Implementing Agency(ies)

V. FOR MORE INFORMATION CONTACT

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VI. APPROVAL

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|-------------------------------|--|
| Task Team Leader(s): | Amparo Elena Gordillo-Tobar |
| Practice Manager (ENR/Social) | Valerie Hickey Recommended on 11-Jun-2019 at 19:31:4 EDT |
| Safeguards Advisor ESSA | Noreen Beg (SAESSA) Cleared on 18-Jun-2019 at 17:50:20 EDT |

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